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Hearing Date: January 21, 2010 at 10:00 a.m.
Objection Deadline: January 19, 2010 at 4:00 p.m.¹

-and-

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Counsel to UPG de MEXICO S de RL de CV

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	§	Chapter 11
	§	
DPH HOLDINGS CORP. <u>et al.</u> ,	§	Case No. 05-44481 (RDD)
	§	
	§	(Jointly Administered)
Reorganized Debtors.	§	

**PRECAUTIONARY RESPONSE OF UPG de MEXICO S de RL de CV
TO DEBTORS' FORTIETH OMNIBUS CLAIM OBJECTION**

UPG de MEXICO S de RL de CV ("*UPG Mexico* ") hereby files this precautionary response (the "*Response*") to the *Debtors' Fortieth Omnibus Claim Objection* (the "*Claim Objection*").

In support of this Response, UPG Mexico respectively states as follows:

BACKGROUND

1. UPG Mexico has filed an unsecured proof of claim in the amount of \$42,827.19 (Claim No. 13546) against Debtor Delphi Automotive Systems LLC.

¹ The Objection Deadline was originally January 14, 2010 at 4:00 p.m. Debtors' counsel agreed to an extension through January 19, 2010 in an effort to try to resolve the matter.

2. UPG and its affiliates (collectively, “**UPG**”) have numerous other claims in the Debtors’ cases. UPG is currently working on a global resolution of these claims with the Debtors. A settlement-in-principal has been reached and is awaiting documentation.

3. UPG Mexico requests that the hearing on this matter be adjourned until such time as the parties are able to finalize their global resolution.

4. Such adjournment is appropriate as it may moot the need for a hearing (thereby preserving judicial and the estates’ resources) and will avoid a piecemeal resolution of UPG’s claims (thereby fostering efficiency).

MEMORANDUM OF LAW

5. UPG Mexico submits that the relevant legal authorities, if any, are set forth in this Response and that no novel issues of law have been raised. Accordingly, UPG Mexico requests that the requirement pursuant to Local Bankruptcy Rule 9013-1(b) that they file a memorandum in support of this Objection be deemed satisfied.

RESERVATION OF RIGHTS

6. UPG Mexico reserves the right to update or supplement this Response as necessary.

RETURN ADDRESS FOR REPLY

7. All and any responsive pleadings to this Response must be delivered as follows:

To counsel for UPG Mexico:

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CONCLUSION

WHEREFORE, UPG Mexico respectfully requests that the Court enter an order (i) adjourning the hearing on the Debtors' Claim Objection until after the parties have concluded their settlement discussions and (ii) granting such other and further relief as this Court deems necessary and proper.

Dated: January 19, 2010

Respectfully submitted,

UPG de MEXICO S de RL de CV

By: /s/ D. Farrington Yates
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